

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

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|---------------------|---|-----------------------------------|
| WENTAO LI, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Case No. 1:20-cv-000241 (LMB-TCB) |
| |) | |
| JEFF Z. XU, et al., |) | |
| |) | |
| Defendants. |) | |

**PLAINTIFF’S MOTION TO COMPEL DISCOVERY RESPONSES AND FOR
SANCTIONS AGAINST DEFENDANTS JEFF Z. XU AND ASTON TECHNOLOGIES,
INC.**

COMES NOW Plaintiff Wentao Li, by its undersigned attorneys, and pursuant to Rule 37 of the Federal Rules of Civil Procedure and Local Rule 37 hereby moves this Court for an order compelling Defendants Jeff Z. Xu (Xu) and Aston Technologies, Inc. (Aston) to provide responses to Plaintiff’s First Interrogatories and Plaintiff’s First Set of Requests for Production of Documents as served on each Defendant. As explained in detail in Plaintiff’s accompanying Memorandum, Defendant has failed to provide any responses whatsoever to these discovery requests and stands merely on baseless, boilerplate objections as to every interrogatory and request served.

Undersigned counsel hereby certifies that on both August 20, 2020, and on August 27, 2020 undersigned counsel attempted in good faith to confer with Defendants’ counsel to resolve the discovery matters at issue in the present motion.

Respectfully submitted,

WENTAO LI
By counsel:

/s/

J. Andrew Baxter
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CERTIFICATE OF SERVICE

I hereby certify that on August 28, 2020, I filed the foregoing with the Court's CM/ECF system which caused a Notice of Electronic Filing (NEF) via e-mail upon all counsel of record.

/s/

J. Andrew Baxter